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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

**TROY JAMES WINSLOW; HAGOP  
("JACK") KHARIKIAN,**

Plaintiffs,

v.

**OREGON HEALTH & SCIENCE  
UNIVERSITY; DAVID QUITMEYER, in  
his individual capacity; ADMIR  
BEGANOVIC, in his official and  
individual capacities; KRISTA  
KOLARIK, in her official and individual  
capacities; QIANA WILLIAMS, in her  
official and individual capacities,**

Defendants.

Civil Case No. 3:24-cv-02105-SI

**JOINT RULE 26(F) DISCOVERY  
PLAN AND CONFERENCE REPORT**

## **I. Conference of Counsel**

The parties hereby jointly submit their Discovery Plan and conference report, as required by Fed. R. Civ. P. 26(f). A videoconference meeting was held on March 5, 2025, and was attended by attorneys Charese Rohny and Andrew Toney-Noland for the plaintiffs, Ryan Gibson for defendant David Quitmeyer and Karen O’Kasey for defendants Oregon Health Sciences University (OHSU), Admir Beganovic, Krista Kolarik, and Qiana Williams. The parties continued subsequently to confer via email communication.

## **II. Initial Disclosures**

Except as noted below with respect to defendant David Quitmeyer, the parties have agreed to provide initial disclosures and initial discovery protocols as required by Fed. R. Civ. P. 26(a)(1) and LR 26-7. The parties have agreed to confer if more time is needed to complete initial disclosures and discovery protocols. Attached hereto is the court’s Fed. R. Civ. P. 26(a) Discovery Agreement.

## **III. Discovery Plan**

The parties propose to the court the following discovery plan and pretrial schedule:

- A. Plaintiffs estimate that they will depose 10 witnesses initially, and anticipate, given there are two plaintiffs and multiple key players, that they will likely confer and seek leave from the court for more depositions in excess of 10 if deemed necessary during the discovery process. The parties anticipate conducting depositions beginning in late May 2025. (The parties are hopeful that the court will rule on Defendant Quitmeyer’s Motion to Dismiss, filed March 7, 2025, prior to mid-May 2025 deposition dates.)
- B. Production of documents will be provided electronically to parties in a digital format, with all metadata, via a secure HIPAA compliant platform.
- C. The parties agreed to and have filed a Stipulated Protective Order.
- D. The last date for completion of all non-expert discovery shall be on November 26, 2025.
- E. All dispositive motions shall be due on January 26, 2026.
- F. Expert disclosure will be due 30 days after this court’s ruling on dispositive motions. Expert discovery will be completed within 45 days of expert disclosure.
- G. The Joint Alternative Dispute Resolution Report and Pretrial Order will be due consistent with the court’s direction.

- H. The Parties request that the Court set a Rule 16 conference within 30 days after ruling on dispositive motions, and if the case is not fully dismissed at that time, to schedule pretrial and trial deadlines.
- I. Defendant Quitmeyer and Plaintiffs have agreed to an extension of producing to each other initial disclosures pursuant to FRCP 26(a)(1) and LR 26-7 until 30 days before the first deponent is scheduled to be deposed in this matter.

DATED this 20<sup>th</sup> of March, 2025

/s/ Charese Rohny

Charese Rohny, OSB No. 95396  
Of Attorney for Plaintiffs

DATED this 20<sup>th</sup> of March, 2025

/s/ Karen O'Kasey

Karen O'Kasey, OSB No. 870696  
Of Attorneys for Defendants Oregon Health  
& Science University, Admir Beganovic,  
Krista Kolarik and Qiana Williams

DATED this 20<sup>th</sup> of March, 2025

/s/ Ryan S. Gibson

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Of Attorneys for Defendant Quitmeyer